

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Amanda Renee Abston
Donald Clifford Abston, Jr., Debtors**

**Case No. 22-51322-KMS
CHAPTER 13**

RESPONSE

COME NOW, Debtors, by and through counsel, and respond to Creditor, PennyMac
Loan Services LLC's Motion for Relief from Automatic Stay and for Abandonment or
Alternatively, for Adequate Protection (dk # 64) as follows:

1. Debtors commenced this case on 11/17/2022 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtors can continue making the plan payments.

WHEREFORE, Debtors pray for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

Of Counsel:

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on June 18, 2025, to:

By USPS First Class Mail:

PennyMac Loan Services, LLC
P.O. Box 2410
Moorpark, CA 93020

By Electronic CM/ECF Notice:

Warren Cuntz

U.S. Trustee

Kimberly D. Putnam, Attorney for Creditor

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

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4 UNITED STATES BANKRUPTCY COURT
5 SOUTHERN DISTRICT OF MISSISSIPPI
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IN RE:

Amanda Renee Abston
Donald Clifford Abston, Jr.

CASE NO: 22-51322

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

11 On 6/18/2025, I did cause a copy of the following documents, described below,

12 Response

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18 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
incorporated as if fully set forth herein.20 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
21 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
22 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
fully set forth herein.23 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
served electronically with the documents described herein per the ECF/PACER system.

24 DATED: 6/18/2025

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

25
26 The Rollins Law Firm
27 702 West Pine St
Hattiesburg, MS 39401
601 500 5533
28 trollins@therollinsfirm.com

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4 **UNITED STATES BANKRUPTCY COURT**
5 **SOUTHERN DISTRICT OF MISSISSIPPI**
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8 IN RE:
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10 Amanda Renee Abston
11 Donald Clifford Abston, Jr.
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13 CASE NO: 22-51322
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16 **CERTIFICATE OF SERVICE**
17 **DECLARATION OF MAILING**
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19 Chapter: 13
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21 On 6/18/2025, a copy of the following documents, described below,
22 Response
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24 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
25 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
26 herein.
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28 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
29 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
30 Service and that it is true and correct to the best of my knowledge, information, and belief.
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32 DATED: 6/18/2025
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36 Miles Wood
37 BK Attorney Services, LLC
38 d/b/a certificateofservice.com, for
39 Thomas C. Rollins, Jr.
40 The Rollins Law Firm
41 702 West Pine St
42 Hattiesburg, MS 39401
43

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

PENNYMAC LOAN SERVICES, LLC
P.O. BOX 2410
MOORPARK CA 93020